IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

LOCAL 25 SEIU WELFARE FUND and)	
LOCAL 25 SEIU & PARTICIPATING)	
EMPLOYERS PENSION TRUST,)	
)	
Plaintiffs,)	
)	Case No. 07 C 6841
v.)	
)	Judge Ronald A. Guzman
TOTAL FACILITY MAINTENANCE, INC.,)	
)	
Defendant.)	

DEFENDANT'S MOTION FOR EXTENSION OF TIME IN WHICH TO ANSWER OR OTHERWISE PLEAD

Defendant TOTAL FACILITY MAINTENANCE, INC. ("Total"), by its attorneys, moves this Honorable Court for an extension of time in which to answer or otherwise plead to Plaintiffs' Complaint. In support of this Motion, Total states as follows:

- 1. Since receiving the Complaint, Defendant Total only recently retained counsel for purposes of defending this new action. Counsel needs additional time in which to investigate the claims in the Complaint and to prepare an adequate response.
- 2. Counsel for Total has contacted counsel for Plaintiffs and advised that Total would like to try to resolve this matter. Total is, however, in the process of gathering the necessary documents and other information to both provide for that purpose as well as to allow it to form an appropriate response to the Complaint overall.
- 3. Total, therefore, respectfully requests that this Court allow it an additional twenty-one (21) days in which to answer or otherwise plead to Plaintiffs' Complaint. No party to these proceedings will be unreasonably prejudice by the requested extension and this Motion is not brought for any improper purpose or unreasonable delay.

WHEREFORE, Defendant TOTAL FACILITY MAINTENANCE, INC. ("Total"), by its undersigned counsel, respectfully requests that this Court grant it an additional twenty-one (21) days within which to file responsive pleadings to Plaintiffs' Complaint, and grant Total such further relief as this Court deems just, or to which it is otherwise entitled as a matter of law.

Respectfully submitted,

TOTAL FACILITY MAINTENANCE, INC.

Bv:

One of its Attorneys

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